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July 12, 2017

Chairman Ajit Pai  
Federal Communications Commission  
445 Twelfth Street, SW  
Washington, DC 20554

Re: *Ex Parte Letter: TerreStar Corporation Request for Temporary Waiver of  
Substantial Service Requirements– WT Docket No. 16-290*

Dear Chairman Pai:

Steward Health Care is a fully integrated national health care services organization committed to providing the highest quality of care in the communities where our patients live. Steward owns and operates 18 community hospitals across four states, serves over 800 communities, and has more than 23,000 employees. The Steward network includes more than 25 urgent care centers, 42 preferred skilled nursing facilities, substantial behavioral health offerings, and more than 3,700 beds under management.

The innovative, community-based Steward Health Care Network includes thousands of physicians who care for approximately 2 million patients annually. Steward Medical Group, the company's employed physician group, provides more than 1 million patient encounters per year and manages Steward Home Care and Hospice with 300,000 and 35,000 patient encounters respectively. Steward's unique health care service delivery model leverages technology and care coordination to keep patients healthier and in the community. Steward is recognized as one of the nation's leading accountable care organizations. Steward hospitals have received the country's top awards for quality and safety.

Wireless medical telemetry plays a critical part in our patient care, and we expect that these devices will only become more important in the future. These systems allow our doctors and nurses to monitor patients' vital signs remotely and in real time, including heart and respiration rates. With wireless medical telemetry, we can quickly detect and respond to potentially life-threatening changes in our patients' condition. Wireless devices avoid the tripping risks associated with wired systems, and they provide the crucial advantage of giving our patients greater mobility, which has been shown to result in better patient outcomes. Given the benefits of wireless medical telemetry, we are using these systems in an increasing variety of hospital environments, including in surgical settings and general wards.

Steward has become increasingly concerned, however, about a growing threat of interference that could disrupt our wireless medical telemetry systems. Currently, our wireless medical telemetry devices operate in dedicated Wireless Medical Telemetry Service ("WMTS") spectrum in the 1.4 GHz band. With an increasing number of wireless medical telemetry devices being utilized at Steward's hospitals, we are beginning to see signs of spectrum congestion and interference between these monitoring devices. Moreover, we expect that our wireless medical systems will only become more densely distributed in our facilities over time, as our patient population continues to become older and more subject to acute medical issues. If significant interference develops in the WMTS band, our remote patient monitoring systems could become unreliable.

Based on our understanding of TerreStar's waiver request, we believe that an FCC grant of that waiver will be enormously beneficial for our patients. This waiver will make available five additional megahertz of spectrum for wireless medical telemetry in the 1.4 GHz band, an almost 67% capacity increase. This greater capacity will enable Steward to avoid interference between its remote monitoring systems, increase the number of patients using these devices, and take advantage of new telemetry technologies as they are developed. In this way, TerreStar's medical telemetry operations will ensure the reliability of our patient monitoring systems for years to come. Accordingly, we strongly urge the Commission to approve TerreStar's waiver request and take advantage of this opportunity to improve the quality of health care for patients not only at Steward, but for millions of patients at other hospitals and health care facilities across the country.

Respectfully submitted,

  
John Polanowicz  
EVP, Hospital Services Group